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12 *Co-Lead/Liaison Counsel for Plaintiffs*

13 IN THE UNITED STATES DISTRICT COURT

14 FOR THE DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products
16 Liability Litigation

No. MD-15-02641-PHX-DGC

**NOTICE OF ERRATA AND
PLAINTIFFS' AMENDED NOTICE
OF SERVICE OF DISCLOSURE OF
EXPERT TESTIMONY
(MERIDIAN & DENALI)**

17 On April 7, 2017, Plaintiffs filed their Notice of Service of Expert
18 Testimony [Doc. #5534]. Plaintiffs' Notice inadvertently failed to include the full list of
19 expert disclosures, including specifically the previously served expert report of Drs.
20 Kinney, Roberts, and Kalva, which is applicable to the Meridian and Denali filters.
Plaintiffs provide this errata and amended notice to incorporate that prior disclosure.

21 Pursuant to Case Management Order 22, Plaintiffs hereby provide notice that they
22 have served on this date the expert reports in accordance with Federal Rule of Civil
23 Procedure 26(a)(2) of the following expert witnesses relating to the Meridian and Denali
24 filters:

25 *Robert M. McMeeking, Ph.D., NAE, FREng, FRSE, LFASME*

26 *Robert O. Ritchie, Ph.D.*

27 *Suzanne Parisian, M.D.*

28 *Robert L. Vogelzang, M.D.*

Mark J. Eisenberg, M.D.

Plaintiffs further designate and incorporate the content, substance, and opinions of the following expert witnesses in this MDL previously served on Defendants on March 6, 2017:

*Thomas Kinney, M.D., M.S.M.E., Anne Christine Roberts, M.D.,
and Sanjeeva Kalva M.D.*

Plaintiffs also further designate and incorporate the content, substance, and opinions of the following expert witnesses in this MDL previously served on Defendants on March 3, 2017:

David Garcia, M.D. and Michael B. Streiff, M.D.

Robert M. McMeeking, Ph.D., NAE, FREng, FRSE, LFASME

Robert O. Ritchie, Ph.D.

Suzanne Parisian, M.D.

Rebecca Betensky, Ph.D.

David A. Kessler, M.D.

Robert L. Vogelzang, M.D.

Plaintiffs also further designate and incorporate the content, substance, and opinions of the following expert witnesses in this MDL previously served on Defendants on February 10, 2017 in the case of *Barraza, et al. v. C.R. Bard, Inc., et al.* (United States District Court, District of Arizona, class action Case No. 2:16-cv-01374-DGC):

Rebecca Betensky, Ph.D.

David W. Bates, M.D., MSc

Steven M. Hertz, M.D.

Mark J. Eisenberg, M.D.

Finally, Plaintiffs also designate and incorporate the content, substance, and opinions of Dr. David A. Kessler previously served on Defendants on September 27, 2016 in the Circuit Court of the case of *Austin v. C. R. Bard, Inc., et al.* (17th Judicial Circuit, in and for Broward County, Florida, Case No.: CACE-15-008373, Div: 07).

1 Plaintiffs are filing this notice in lieu of filing the original discovery papers pursuant
2 to LRCiv 5.2.

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4 RESPECTFULLY SUBMITTED this 10th day of April, 2017.

5 LOPEZ McHUGH LLP

6 By: /s/ Mark S. O'Connor
7 Ramon Rossi Lopez (CA Bar No. 86361)
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13 *Attorneys for Plaintiffs*

14 **CERTIFICATE OF SERVICE**

15 I hereby certify that on this 10th day of April, 2017, I electronically transmitted the
16 attached document to the Clerk's Office using the CM/ECF System for filing and transmittal
17 of a Notice of Electronic Filing.

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19 /s/ Deborah Yanazzo

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